

The Hon. Sylvia O. Hinds-Radix
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
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VIA ECF

Hon. Lorna G. Schofield
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

The application for an extension is **GRANTED**. By **May 3, 2022**, Defendant shall file its opposition and any cross-motion for summary judgment. By **May 17, 2022**, Plaintiff shall file a reply and opposition. By **June 1, 2022**, Defendant shall file a reply. The Clerk of Court is respectfully directed to close the motion at Docket No. 19.

Dated: April 6, 2022
New York, New York

Re: *M.D. v. N.Y.C. Dep't of Education*, 21-cv-9180 (LGS)(KHP)


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Dear Judge Schofield:

I am a Special Assistant Corporation Counsel in the office of Corporation Counsel, Georgia M. Pestana, attorney for Defendant in the above-referenced action, wherein Plaintiffs seeks solely attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, *et seq.*, as well as for this action.

I write to respectfully request that the filing deadline for Defendant's opposition papers be extended from April 25, 2022 to May 3, 2022; that the filing deadline for Plaintiff's reply papers be extended from May 9, 2022 to May 17, 2022; and that the filing deadline for Defendant's sur-reply papers be extended from May 23, 2022 to June 1, 2022, as the supervising attorney will be out of the country and unreachable for the final two weeks of April. Plaintiff consents to these requests. This is the first request for an extension of the motion papers' filing deadlines.

Accordingly, Defendant respectfully requests that the filing deadline for Defendant's opposition papers be extended to May 3, 2022; that the filing deadline for Plaintiff's reply papers be extended to May 17, 2022; and that the filing deadline for Defendant's sur-reply papers be extended to June 1, 2022.

Thank you for considering these requests.

Respectfully submitted,

/s/
Martha Nimmer
Special Assistant Corporation Counsel

cc: Justin Coretti, Esq. (via ECF)